

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

CARLOS J. FUENTES JIMENEZ

Debtor

BANKRUPTCY 21-00427 EAG

CHAPTER 7

DEBTOR REQUEST FOR EXTENSION OF TIME TO RESPOND TO ORDER at doc #52
TO THE HONORABLE COURT:

COMES NOW debtor through his legal representation and respectfully prays as follows for an extension of time to respond to Order at doc #52:

1. Debtor filed this case under the provisions of Chapter 7 of the Bankruptcy Code on **February 1, 2021**. The §341 Meeting of Creditors has been heard and closed.
2. The §523 and §727 Complaint deadline expired on **May 10, 2021** and there are no complaints or extensions to file complaints pending in this case.
3. Debtor is awaiting his discharge and has so requested entry of his discharge at doc #51 on June 25, 2021 and once again today by separate motion since there is no basis in the law to further delay debtor's discharge.
4. BPPR has moved this Court to *Compel Debtor to Execute Deed of Assignment & Transfer of Property* at doc #47 filed on June 21, 2021.
5. In response to BPPR's *Motion* at doc #47 this Court on June 30th, 2021 ordered debtor "to address whether the property belonging to their extinct conjugal partnership was partitioned in the divorce judgment, whether he transferred to Mrs. Troche his interest in the property located at 1115 Marbella Este Mansiones de Vista Mar Marina, Carolina, Puerto Rico, and if so, why is it property of the estate and what are the authorities that support his position."
6. Today, with leave of Court, debtor requests an extension of time to respond and address the three queries posed by the Court.
7. Although our response is virtually completed and drafted, parties have today initiated discussions to settle this matter in a more expedient and cost-effective manner and have agreed that debtor request an extension of time to allow the discussions to go forward and concluded.
8. Debtor seeks additional time to address what we understand to be very basic concept in the law: Whether a transfer has been made of the subject property prior

to the bankruptcy, which debtor anticipates has not been effectuated by public deed as debtor understands to be required, nor has it the transfer been elevated to the Property Registry as to affect third parties which in this case are the creditors of the Estate. Accordingly, whether the property interest continues to be an asset of this bankruptcy estate, although protected under what we understand to be the ex-spouse's claimed homestead under Puerto Rico Homestead Law 95.

9. Debtor requests 21 days from tomorrow's date to respond to this Court's Order and oppose BPPR's motion to compel at doc #47, time which would expire on **August 4, 2021** if allowed by this Court.

WHEREFORE debtor respectfully prays that an extension be allowed to debtor to respond to this Court's Order at doc #52 until at least **August 4, 2021** to allow the parties to conclude discussions initiated today, discussions which we hope to aid in the resolution of the issues between the parties and avoid costly litigation.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

That on this same date a true and exact copy of the Motion has been electronically filed and caused to be noticed to all party's participant in CmECF which includes the U.S.T. and the C7 Trustee, as follows:

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DATED: July 13, 2021.

s/L A Morales

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